

1 **BLANK ROME LLP**  
2 Arash Beral (SBN 245219)  
3 [arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)  
4 Todd M. Malynn (SBN 181595)  
5 [todd.malynn@blankrome.com](mailto:todd.malynn@blankrome.com)  
6 Victor Sandoval (SBN 344461)  
7 [victor.sandoval@blankrome.com](mailto:victor.sandoval@blankrome.com)  
8 2029 Century Park East | 6<sup>th</sup> Floor  
9 Los Angeles, CA 90067  
10 Telephone: 424.239.3400  
11 Facsimile: 424.239.3434

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13 Attorneys for Defendants, Counterclaimants, and  
14 Third Party Plaintiffs PCJV USA, LLC, PCI  
15 TRADING LLC, POTATO CORNER LA  
16 GROUP, LLC, GK CAPITAL GROUP, LLC,  
17 NKM CAPITAL GROUP, LLC and GUY  
18 KOREN, and Defendants J & K AMERICANA,  
19 LLC, J&K LAKEWOOD, LLC, J&K  
20 OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J  
21 & K ONTARIO, LLC, J&K PC TRUCKS, LLC,  
22 HLK MILPITAS, LLC, and GK CERRITOS, LLC

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14 **UNITED STATES DISTRICT COURT**  
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16 **CENTRAL DISTRICT OF CALIFORNIA**

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18 SHAKEY'S PIZZA ASIA VENTURES,  
19 INC, a Philippines corporation,

20 Plaintiff,

21 vs.

22 PCJV USA, LLC, a Delaware limited  
23 liability company; PCI TRADING , LLC, a  
24 Delaware limited liability company; GUY  
25 KOREN, an individual; POTATO CORNER  
26 LA GROUP, LLC, a California limited  
27 liability company; NKM CAPITAL GROUP,  
28 LLC, a California limited liability company;  
J & K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California limited  
liability company; J&K VALLEY FAIR,  
LLC, a California limited liability company;  
J & K ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS, LLC, a  
California, limited liability company; GK  
CERRITOS, LLC, a California, limited  
liability company; J&K PC TRUCKS, LLC,  
a California limited liability company; and,  
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld, Jr.*

**DECLARATION OF ARASH  
BERAL IN RESPONSE TO DKT.  
NO. 155**

Complaint Filed: May 31, 2024  
Trial Date: August 4, 2025

1 limited liability company and DOES 1  
2 through 100, inclusive,

3 Defendants.

4 PCJV USA, LLC, a Delaware limited  
5 liability company; PCI TRADING LLC, a  
6 Delaware limited liability company;  
7 POTATO CORNER LA GROUP LLC, a  
8 California limited liability company; GK  
9 CAPITAL GROUP, LLC, a California  
10 limited liability company; NKM CAPITAL  
11 GROUP LLC, a California limited liability  
12 company; and GUY KOREN, an individual,

13 Counter-Claimants,

14 v.

15 SHAKEY'S PIZZA ASIA VENTURES,  
16 INC, a Philippines corporation,

17 Counter Defendant.

18 PCJV USA, LLC, a Delaware limited  
19 liability company; PCI TRADING LLC, a  
20 Delaware limited liability company;  
21 POTATO CORNER LA GROUP LLC, a  
22 California limited liability company; GK  
23 CAPITAL GROUP, LLC, a California  
24 limited liability company; NKM CAPITAL  
25 GROUP LLC, a California limited liability  
company; and GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a California  
corporation; CINCO CORPORATION, a  
Philippines corporation; and ROES 1 through  
10, inclusive,

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25 Third Party Defendants.

# **DECLARATION OF ARASH BERAL**

I, Arash Beral, declare as follows:

1. I am a partner at Blank Rome LLP, counsel of record for Defendants, Counterclaimants, and Third Party Plaintiffs. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. Defendant PCJV USA, LLC issued a check (representing the \$26,596 in attorney's fees awarded per Dkt. No. 155) and confirmed that it mailed that check to Mr. Murphy's office. While I still have not yet received payment instructions from Mr. Murphy, I assume that the check, as written, is sufficient for Mr. Murphy to make the decision either to apply the check to his new law firm's trust account (which, I hope, we have properly titled the "Fox Rothschild LLP Trust Account") or to have his client apply it to its account (as we have also added "or Shakey's Pizza Asia Ventures, Inc." in the "pay to the order of" line of the check). A true and correct copy of the check is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed April 17, 2025, within the United States, its territories, possessions, or  
commonwealths.

/s/ Arash Beral

Arash Beral

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**CERTIFICATE OF SERVICE**  
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The undersigned certifies that on April 17, 2025, the foregoing document was  
4 electronically filed with the Clerk of the Court for the United States District Court,  
5 Central District of California, using the Court's Electronic Case Filing (ECF)  
6 system. I further certify that all participants in the case are registered CM/ECF  
7 users and that service will be accomplished by the CM/ECF system.  
8

I certify under penalty of perjury that the foregoing is true and correct.  
9  
Executed on April 17, 2025.

10 By: /s/AJ Cruickshank  
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